

EPA - REGION 10
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DEC 12 1995
WATER DIVISION
DRINKING WATER/GROUND WATER

December 8, 1995

Mr. Geoff Keeler
Compliance Officer
EPA, Region 10
1200 Sixth Ave.
Seattle, WA 98101

Re: Field Notice of Non-Compliance #010
Smitty's Conoco, #4-260087
Toppenish, Yakima Indian Reservation

Dear Mr. Keeler:

I have enclosed the monthly inventory control summary/reconciliation sheets for the above-mentioned location, and as you will see, we have initiated corrective procedures. Your form is much better than our old one and we have given it to all of our managers to use. In fact, I believe the use of this form answers all your concerns in question 1. a-d in your letter dated October 26, 1995.

As for the delivery volumes being in multiples of 100, I have been told that the gas is metered at the rack and we are given a "net" and a "gross" amount. The drivers stick the tank before to make sure that the gas will fit and he sticks it afterward also and writes both those figures on the bill of lading. Many times gas is delivered at times when the manager is not there to stick the tank themselves or when there may be only one person on duty and they cannot leave the store to go out and stick tanks for a gas drop. Unfortunately, the drivers are only concerned with whether or not the gas will fit. We can ask our employees to cooperate but human nature being what it is, they don't always.

In question number 2, I think that has been resolved with the new 1/8" charts that she started using after your visit. However, I notice that many of her readings are to whole numbers and I suspect that perhaps she is not comfortable with fractions and may be "fudging" to avoid 1/8". This will be rectified soon however, because we are ordering automatic tank gauges for this store and any others of ours that do not have one. Since we cannot be everywhere and do everything ourselves, we are moving to as much automation as possible. The hope is to eliminate human error where ever possible.

I hope these measures address our problems to your satisfaction, keeping in mind that we are always trying to improve our efficiency and productiveness, including better control over our gas inventory.

Sincerely,

Susan K Smith

Susan K. Smith,
R.H. Smith Dist.

R.H. Smith Dist. Co., Inc.

315 E. Wine Country Rd.
P.O. Box 6
Grandview, WA 98930
TEL (509) 882-3377
FAX (509) 882-5755

*12/22/95
Looks good
(except 1/8" units).
Keeler*